

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

UNITED STATES OF AMERICA,)
Plaintiff,)
)
v.) Docket No. 2:19-CR-141-2
)
JEFFREY BARBER,)
Defendant.)

MOTION FOR DETENTION

NOW COMES the United States of America, by and through its attorney, Christina E. Nolan, United States Attorney for the District of Vermont, and moves for pretrial detention of the above-named defendant pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility for Detention. This defendant is eligible for detention because the case involves acquisition and possession of firearms over a two-day period in the Spring of 2019. *See* 18 U.S.C. § 3142(f)(1)(E). Additionally, Barber, who has no apparent ties to Vermont, may pose a risk of flight and, given his apparent access to firearms, could pose a risk of threats to witnesses. 18 U.S.C. § 3142(f)(2).

2. Reason For Detention. The Court should detain the defendant because there are no conditions of release which will reasonably assure the defendant's appearance as required and the safety of the community. As stated above, Barber has no apparent ties to Vermont. The government will rely on information in the Pretrial Services Report to identify any stable residences in New York. Additionally, as alleged in the indictment, Barber was involved in the acquisition of a number of firearms through straw purchases in Vermont over a two day period in the spring of 2019. His access to firearms that are not registered to him raises a risk of danger to the community.

3. Rebuttable Presumption. The United States will not invoke the rebuttable presumption against defendant under § 3142(e).

4. Time For Detention Hearing. The United States requests the court conduct the detention hearing at first appearance, or as soon as a Pretrial Services Investigative Report can be prepared.

Dated at Burlington, Vermont, this 16th day of October, 2019.

CHRISTINA E. NOLAN
United States Attorney

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